



James Ward
Special Counsel
Actuate Law LLC
641 W. Lake Street, 5th Floor
Chicago, IL 60661
james.ward@actuatelaw.com

December 28, 2023

VIA ELECTRONICALLY FILED

Magistrate Judge Michael A. Hammer
United States District Court District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Courtroom: MLK 2C
Newark, NJ 07102

RE: *Agdal v Danis*, Case No. 2:23-cv-16873

Dear Magistrate Judge Hammer,

We represent non-party Joshua Wander, on whom Plaintiff Agdal served a subpoena ad testificandum on December 1, 2023, and which is currently the subject of a dispute between the parties. We write to request a conference call or meeting with Plaintiff's counsel and Your Honor to discuss this matter, predicate to a potential motion to quash the subpoena.

Respectfully submitted,

/s/ James Ward

James Ward
Special Counsel, Actuate Law LLC

CC: Joseph B. Shumofsky, Esq.
Linxuan Yan, Esq.
Mark A. Berman, Esq.
Kelly A. Zampino